



San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT



MAR 01 2012

Gerardo C. Rios, Chief
Permits Office
Air Division
U.S. EPA - Region IX
75 Hawthorne St
San Francisco, CA 94105

Re: **Proposed Authority to Construct / Certificate of Conformity (Minor Mod)**
District Facility # S-892
Project # 1120446

Dear Mr. Rios:

Enclosed for your review is the District's engineering evaluation of an application for Authority to Construct for Pactiv LLC, located at 2024 Norris Road, Bakersfield, CA, which has been issued a Title V permit. Pactiv LLC is requesting that a Certificate of Conformity, with the procedural requirements of 40 CFR Part 70, be issued with this project. The project authorizes modification of 3 extrusion cooling lines by replacement of water quench cooling with more modern enhanced air cooling.

Enclosed is the engineering evaluation of this application, a copy of the current Title V permit, and proposed Authority to Construct # S-892-10-31, '-10-32, and '-10-33 with Certificate of Conformity. After demonstrating compliance with the Authority to Construct, the conditions will be incorporated into the facility's Title V permit through an administrative amendment.

Please submit your written comments on this project within the 45-day comment period that begins on the date you receive this letter. If you have any questions, please contact Mr. Leonard Scandura, Permit Services Manager, at (661) 392-5500.

Thank you for your cooperation in this matter.

Sincerely,

David Warner
Director of Permit Services

Enclosures
cc: Richard Edgehill, Permit Services

Seyed Sadredin
Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
Modesto, CA 95356-8718
Tel: (209) 557-6400 FAX: (209) 557-6475

Central Region (Main Office)
1990 E. Gettysburg Avenue
Fresno, CA 93726-0244
Tel: (559) 230-6000 FAX: (559) 230-6061

Southern Region
34946 Flyover Court
Bakersfield, CA 93308-9725
Tel: 661-392-5500 FAX: 661-392-5585



San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT



MAR 01 2012

Mike Perez
Pactiv LLC
2024 Norris Road
Bakersfield, CA 93308

**Re: Proposed Authority to Construct / Certificate of Conformity (Minor Mod)
District Facility # S-892
Project # 1120446**

Dear Mr. Perez:

Enclosed for your review is the District's analysis of your application for Authority to Construct for the facility identified above. You have requested that a Certificate of Conformity with the procedural requirements of 40 CFR Part 70 be issued with this project. The project authorizes modification of 3 extrusion cooling lines by replacement of water quench cooling with more modern enhanced air cooling.

After addressing any EPA comments made during the 45-day comment period, the Authority to Construct will be issued to the facility with a Certificate of Conformity. Prior to operating with modifications authorized by the Authority to Construct, the facility must submit an application to modify the Title V permit as an administrative amendment, in accordance with District Rule 2520, Section 11.5.

If you have any questions, please contact Mr. Leonard Scandura, Permit Services Manager, at (661) 392-5500.

Thank you for your cooperation in this matter.

Sincerely,

David Warner
Director of Permit Services

Enclosures
cc: Richard Edgehill, Permit Services

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San Joaquin Valley Air Pollution Control District
Authority to Construct Application Review
Modification to Extrusion Cooling Process

Facility Name:	Pactiv LLC	Date:	February 28, 2012
Mailing Address:	2024 Norris Road	Engineer:	Richard Edgehill
	Bakersfield, CA 93308	Lead Engineer:	Richard Karrs
		Date:	RWK 2-29-12.
Contact Person:	Mike Perez		
Telephone:	661-392-4020		
Fax:	661-392-4060		
E-Mail:	Mperez@pactiv.com		
Application #(s):	S-892-10-31, '-10-32, and '-10-33		
Project #:	S-1120446		
Deemed Complete:	02/27/12		

I. Proposal

Pactiv Corporation (Pactiv) recently transferred ownership of their polystyrene foam manufacturing and processing facility to Pactiv LLC (District Transfer of Ownership project 112040). Prior to the transfer of ownership Authorities to Construct (ATCs) S-892-10-28, '-10-29, and '-10-30 (project 1113732) were issued authorizing the modification of 3 extrusion lines by replacement of water quench cooling with more modern enhanced air cooling. ATCs S-892-10-28, '-10-29, and '-10-30 were not implemented. According to District policy ADM 1280, ATCs for which construction has not commenced (as defined by Rule 2050) can not be transferred to the new owner unless the new owner has acquired "vested right" under California law. However, the new owner may apply for the ATCs specifying that the details are the same as contained in the application support information in the previous owner's submittal.

Pactiv LLC has submitted new applications for the above mentioned ATCs. The previous engineering evaluation was included in the application indicating that details are the same as the previous project.

As in the previous project 1113732 three ATCs will be issued, each authorizing modification of one extrusion line. This allows the facility flexibility for a staged approach with startup of each (one of the three) line after it is modified with the new cooling equipment. Note that the District Compliance recommendation for project 1113732 to include the following recordkeeping condition of the lifetime emissions apply for this project.

26. Operator shall maintain records of monthly calculations of lifetime emissions and shall make such records readily available for District inspection upon request. [District Rule 2201] Y

As explained in the Compliance Section this request is not subject to New Source Review (see Section VIII); therefore, BACT, offsets, and public noticing are not required.

PTO S-892-10-26 and ATCs S-892-10-28, '-10-29, and '-10-30 are included in **Attachment I**.

Pactiv recently received their renewed Title V Permit on January 6, 2012. This modification can be classified as a Title V minor modification pursuant to Rule 2520, Section 3.20, and can be processed with a Certificate of Conformity (COC). Since the facility has specifically requested that this project be processed in that manner, the 45-day EPA comment period will be satisfied prior to the issuance of the Authority to Construct. Pactiv must apply to administratively amend their Title V permit.

II. Applicable Rules

Rule 2201	New and Modified Stationary Source Review Rule (4/21/11)
Rule 2520	Federally Mandated Operating Permits (6/21/01)
Rule 4101	Visible Emissions (2/17/05)
Rule 4102	Nuisance (12/17/92)
Rule 4682	Polystyrene, Polyethylene, and Polypropylene Products Manufacturing (9/20/07)
CH&SC 41700	Health Risk Assessment
CH&SC 42301.6	School Notice
Public Resources Code 21000-21177: California Environmental Quality Act (CEQA)	
California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000-15387: CEQA Guidelines	

III. Project Location

The facility is located at 2024 Norris Rd. Bakersfield, CA. The equipment is not located within 1,000 feet of the outer boundary of a K-12 school. Therefore, the public notification requirement of California Health and Safety Code 42301.6 is not applicable to this project.

IV. Process Description

Pactiv produces food grade expanded polystyrene foam products for the home consumer and restaurant industry. The process uses iso-pentane as a VOC blowing agent mixed with CO₂ and methyl formate as non-VOC co-blowing agents.

Polystyrene pellets are melted and mixed with the blowing agent while under high pressure. The entrained blowing agent causes the plastic to “foam” as it leaves the extrusion die head to the lower atmospheric pressure. The extruded foam is stretched over a mandrel to obtain the desired thickness, and then slit to form sheets which are wound up on large rolls. After curing, the polystyrene sheet is warmed as it is unwound through the thermoformers which presses and cuts out the desired shape product. Left over scrap sheet is automatically fed to the scrap grinding operation for reclaim.

It is Pactiv's intention to convert 3 (three) of the existing 10 foam extrusion lines from water quench cooling to enhanced air cooling at the die. The existing process uses water to cool the sheet as it exits the extrusion die. Cooling of the foam sheet results in longer retention of blowing agent in the foam which enhances sheet and skin properties. The new enhanced air cooling process is expected to result in the same or better sheet and skin properties with no increase in VOC emissions.

One ATC will be issued for modification of each of the three extrusion lines.

V. Equipment Listing

Pre-Project Equipment Description:

S-892-10-26: POLYSTYRENE FOAM EXTRUSION PROCESS CONSISTING OF 10 FOAM EXTRUSION LINES

Proposed Modification:

The ATC equipment description will read as follows:

S-892-10-31: MODIFICATION OF POLYSTYRENE FOAM EXTRUSION PROCESS CONSISTING OF 10 FOAM EXTRUSION LINES: CONVERT ONE FOAM EXTRUSION LINE TO AIR COOLED

S-892-10-32: MODIFICATION OF POLYSTYRENE FOAM EXTRUSION PROCESS CONSISTING OF 10 FOAM EXTRUSION LINES: CONVERT ONE FOAM EXTRUSION LINE TO AIR COOLED

S-892-10-33: MODIFICATION OF POLYSTYRENE FOAM EXTRUSION PROCESS CONSISTING OF 10 FOAM EXTRUSION LINES: CONVERT ONE FOAM EXTRUSION LINE TO AIR COOLED

Post Project Equipment Description:

S-892-10-31: POLYSTYRENE FOAM EXTRUSION PROCESS CONSISTING OF 10 FOAM EXTRUSION LINES

S-892-10-32: POLYSTYRENE FOAM EXTRUSION PROCESS CONSISTING OF 10 FOAM EXTRUSION LINES

S-892-10-33: POLYSTYRENE FOAM EXTRUSION PROCESS CONSISTING OF 10 FOAM EXTRUSION LINES

VI. Emission Control Technology Evaluation

VOC emissions are controlled by limiting isopentane in the blowing agent and by venting bead storage, reclaim, and other operations to a regenerative thermal oxidizer (RTO). The permit requires the destruction efficiency to be at least 95%. Typically, the destruction efficiency is measured at greater than 98%. The extrusion operation is uncontrolled except that cooling is expected to keep more of the blowing agent in the final product.

VII. General Calculations

A. Assumptions

Pre and Post Project Potential Emissions (PE) are based on on-site emissions. Facility total material processed or Total Material Input (TMI) does not exceed 151.2 tons/day (Condition # 7 PTO S-892-10-26).

The project results in no change in VOC emissions and is not a NSR Modification. Please see the Compliance Section. Therefore only PE will be calculated for inclusion in the PAS emissions profiles.

B. Emission Factors

Total onsite emissions including process and warehouse emissions: 8.16 lb/ton of total material input (rounded to 8.2 lb/ton in Condition # 6 of PTO S-892-10-26).

C. Calculations

Post Project Potential to Emit (PE2)

There is no change in VOC emissions.

VOC: $8.16 \text{ lb/ton} \times 151.2 \text{ tons/day} = 1233.8 \text{ lb/day}$ (450,334 lb/yr) – VOC emissions in the PAS emissions profile.

Post Project Potential to Emit (PE2)		
	Daily Emissions (lb/day)	Annual Emissions (lb/year)
NO _x	0	0
SO _x	0	0
PM ₁₀	0	0
CO	0	0
VOC	1,233.8	450,334

VIII. Compliance

Rule 2201 New and Modified Stationary Source Review Rule

This rule applies to all new stationary sources and all modifications to existing stationary sources, which are subject to District permitting requirements. This rule defines modification as an action including at least one of the following items:

3.26.1.1 Any change in hours of operation, production rate, or method of operation of an existing emissions unit, which would necessitate a change in permit conditions.

There will be no change in current permit conditions.

3.26.1.2 Any structural change or addition to an existing emissions unit which would necessitate a change in permit conditions. Routine replacement shall not be considered to be a structural change.

No change in current permit conditions is proposed.

3.26.1.3 An increase in emissions from an emissions unit caused by a modification of the Stationary Source when the emissions unit is not subject to a daily emissions limitation.

There is no expected increase in emissions from the extruders

3.26.1.4 Addition of any new emissions unit which is subject to District permitting requirements.

Addition of a new emissions unit is not proposed.

3.26.1.5 A change in a permit term or condition proposed by an applicant to obtain an exemption from an applicable requirement to which the source would otherwise be subject.

No change in permit conditions is proposed. Only a new recordkeeping condition has been added.

Rule 2520 Federally Mandated Operating Permits

This facility is subject to this Rule, and has received their Title V Operating Permit. The proposed modification is a Minor Modification to the Title V Permit pursuant to Section 3.20 of this rule:

In accordance with Rule 2520, 3.20, these modifications:

1. Do not violate requirements of any applicable federally enforceable local or federal requirement;

2. Do not relax monitoring, reporting, or recordkeeping requirements in the permit and are not significant changes in existing monitoring permit terms or conditions;
3. Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;
4. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include:
 - a. A federally enforceable emission cap assumed to avoid classification as a modification under any provisions of Title I of the Federal Clean Air Act; and
 - b. An alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Federal Clean Air Act; and
5. Are not Title I modifications as defined in District Rule 2520 or modifications as defined in section 111 or 112 of the Federal Clean Air Act; and
6. Do not seek to consolidate overlapping applicable requirements.

As discussed above, the facility has applied for a Certificate of Conformity (COC); therefore, the facility must apply to modify their Title V permit with an administrative amendment, prior to operating with the proposed modifications. Continued compliance with this rule is expected. The facility may construct/operate under the ATC upon submittal of the Title V administrative amendment application.

The Title V Compliance Certification form is included in **Attachment III**.

Rule 4101 Visible Emissions

Per Section 5.0, no person shall discharge into the atmosphere emissions of any air contaminant aggregating more than 3 minutes in any hour which is as dark as or darker than Ringelmann 1 (or 20% opacity). The following conditions are included on the current PTO and ATC:

The facility shall conduct weekly visual inspections to determine whether visible emissions are present. If visible emissions are present, the facility will conduct a USEPA Method 9 test within 48 hours. If the Method 9 test indicates that visible emissions are in excess of 1/4 Ringelmann or 5% opacity, the facility will conduct a EPA Method 5 test within 30 days of detection of visible emissions to demonstrate compliance with the particulate matter emission limit. [District NSR Rule and District Rule 1081] Y

Records of visible emissions inspections shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.4.2] Y

The proposed modification to the extrusion cooling process is not expected to affect the compliance status with the rule. Continuous compliance is expected.

Rule 4102 Nuisance

Section 4.0 prohibits discharge of air contaminants which could cause injury, detriment, nuisance or annoyance to the public. Public nuisance conditions are not expected as a result of these operations, provided the equipment is well maintained. Therefore, compliance with this rule is expected.

California Health & Safety Code 41700 (Health Risk Assessment)

District Policy APR 1905 – Risk Management Policy for Permitting New and Modified Sources specifies that for an increase in emissions associated with a proposed new source or modification, the District perform an analysis to determine the possible impact to the nearest resident or worksite.

As demonstrated above, there are no increases in emissions associated with this project, therefore a health risk assessment is not necessary and no further risk analysis is required.

Rule 4682 Polystyrene, Polyethylene, and Polypropylene Products Manufacturing

This rule is applicable to any polystyrene foam, polyethylene, and polypropylene manufacturing and processing operations. This rule sets forth limits of VOC emissions and trichlorofluoromethane (CFC-11) and dichlorofluoromethane (CFC-12) from manufacturing and processing of polystyrene foam, polyethylene, and polypropylene and from the storage of VOC blowing agents.

The facility is current in compliance with the rule and the project is not expected to affect the compliance status. Continued compliance is expected.

California Health & Safety Code 42301.6 (School Notice)

The District has verified that this site is not located within 1,000 feet of a school. Therefore, pursuant to California Health and Safety Code 42301.6, a school notice is not required.

California Environmental Quality Act (CEQA)

The California Environmental Quality Act (CEQA) requires each public agency to adopt objectives, criteria, and specific procedures consistent with CEQA Statutes and the CEQA Guidelines for administering its responsibilities under CEQA, including the orderly evaluation of projects and preparation of environmental documents. The San Joaquin Valley Unified Air Pollution Control District (District) adopted its *Environmental Review Guidelines* (ERG) in 2001. The basic purposes of CEQA are to:

- Inform governmental decision-makers and the public about the potential, significant environmental effects of proposed activities;
- Identify the ways that environmental damage can be avoided or significantly reduced;

- Prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible; and
- Disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved.

The District performed an Engineering Evaluation (this document) for the proposed project and determined that all project specific emission unit(s) are exempt from Best Available Control Technology (BACT) requirements. Furthermore, the District conducted a Risk Management Review and concludes that potential health impacts are less than significant.

Issuance of permits for emissions units not subject to BACT requirements and with health impact less than significant is a matter of ensuring conformity with applicable District rules and regulations and does not require discretionary judgment or deliberation. Thus, the District concludes that this permitting action constitutes a ministerial approval. Section 21080 of the Public Resources Code exempts from the application of CEQA those projects over which a public agency exercises only ministerial approval. Therefore, the District finds that this project is exempt from the provisions of CEQA.

IX. Recommendation

Compliance with all applicable rules and regulations is expected. Pending a successful 45 day EPA review, issue Authorities to Construct S-892-10-28, '-10-29, and '-10-30, subject to the permit conditions on the attached draft Authorities to Construct in **Attachment IV**.

X. Billing Information

Annual Permit Fees			
Permit Number	Fee Schedule	Fee Description	Annual Fee
S-892-10-31	3020-01-H	> 1600 electric motor horsepower	\$ 1,030.00
S-892-10-32	3020-01-H	> 1600 electric motor horsepower	\$ 1,030.00
S-892-10-33	3020-01-H	> 1600 electric motor horsepower	\$ 1,030.00

Attachments

- I: Current PTO S-892-10-26 and ATCs S-892-10-28, '-10-29, and '-10-30
- II: Emissions Profiles
- III: Title V Compliance Certification Form
- IV: Draft Authorities to Construct (ATCs)

ATTACHMENT I

Current PTO S-892-10-26 and ATCs S-892-10-28, '-10-29, and '-10-30

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-892-10-26

EXPIRATION DATE: 01/31/2017

SECTION: NE10 **TOWNSHIP:** 29S **RANGE:** 27E

EQUIPMENT DESCRIPTION:

POLYSTYRENE FOAM EXTRUSION PROCESS CONSISTING OF 10 FOAM EXTRUSION LINES

PERMIT UNIT REQUIREMENTS

1. Operation shall be equipped with roll storage area. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Blowing agent shall consist of isopentane, 10% or greater CO₂ by weight, and methyl formate in amounts necessary to comply with District Rule 4682, Section 5.3.1 on a monthly basis. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
3. Methyl Formate usage shall not exceed 1,975 lb/day. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
4. Particulate matter (PM-10) emissions shall not exceed 0.008 lbm PM-10 per 1,000 lbm polystyrene foam processed. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Total Materials Input (TMI) shall include the total material (including virgin and recycled polystyrene, nucleator, colorant and any other solid additives, and all the blowing agents) fed into the extruders or used in making the final product. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Total VOC emissions from polystyrene foam processing, forming, and on-site storage operations S-892-10 and S-892-17 shall not exceed 8.2 lb per ton of TMI. This emission limit is shared between S-892-10 and S-892-17. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
7. Facility TMI shall not exceed 151.2 tons per day (calculated on a monthly average). [District Rule 2201] Federally Enforceable Through Title V Permit
8. The lifetime emissions from total material input (TMI) shall not exceed 2.4 lb VOC/100 lb TMI (calculated on a monthly average). [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
9. Total VOC emissions from polystyrene foam processing, forming and on-site storage operations shall not exceed 1,233.8 lbs/day (calculated on a monthly average). [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
10. Total VOC blowing agent consumption for the entire facility shall not exceed 8,867.9 lb/day (calculated on a monthly average). [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
11. Weight of VOC blowing agent retained in finished product shall be determined using test method ASTM-D7132-05. [District Rules 1081 and 2201] Federally Enforceable Through Title V Permit
12. Permittee shall perform blowing agent retention testing on an annual basis. Such results will be used to calculate emissions for both the 8.2 lb per ton TMI and 2.4 lb/100 lb TMI emissions limits. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

13. VOC emissions from polystyrene foam processing, forming, and on-site storage operations, per ton of TMI shall be calculated on a monthly basis, using the following equation: $\text{lbs VOC emitted per ton of TMI} = (2000)[\text{BAI} - (\text{PFP} \times \text{BAR}) - \text{BAD} + \text{WH}]/\text{TMI}$ where BAI = pounds VOC blowing agent introduced/month, PFP = pounds of polystyrene foam produced/month, BAR = weight fraction of VOC blowing agent retained in finished product, BAD = pounds of VOC blowing agent destroyed/month in the RTO, WH = pounds of onsite warehouse emissions, and TMI = total materials input/month. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
14. Lifetime emissions of VOC (LE) from total material input (TMI) shall be calculated on a monthly basis using the following equation: $\text{LE (lb VOC/100 lb TMI)} = 100 \times [\text{BAI} - (\text{RECOLL} \times \text{EFF})]/\text{TMI}$ where BAI = pounds VOC blowing agent used/month, RECOLL = pounds blowing agent captured/month from reclaim operations, EFF = control efficiency of thermal oxidizer, and TMI is the total material (including virgin and recycled polystyrene, nucleator, colorant and any other solid additives, and all the blowing agents) processed/month. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
15. Quantity of VOCs from the extruders, captured from reclaim operations, RECOLL, shall be calculated on a monthly basis using the following equation: $\text{RECOLL} = (\text{SCRAPBA} - \text{RPPBA})$ where SCRAPBA = pounds of thermoformer and extruder scrap VOCs entering the reclaim operations per month from the extruders and RPPBA is the pounds/month RPP VOCs (VOCs in reclaimed polystyrene pellets) made from thermoformer and extruder scrap from the extruders. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
16. VOC content of thermoformed products and reclaimed polystyrene pellets (RPP) shall be determined on an annual basis. [District Rule 2201] Federally Enforceable Through Title V Permit
17. RTO control efficiency shall be determined on an annual basis. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Based on 2002 source test, RTO capture efficiency for calculational purposes shall be 100%. RTO capture efficiency shall be recalculated within 60 days of any change in equipment or process design. [District Rule 2201] Federally Enforceable Through Title V Permit
19. Visible emissions shall be inspected weekly during operation. If visible emissions are present, the facility will conduct a USEPA Method 9 test within 48 hours. If the Method 9 test indicates that visible emissions are in excess of 1/4 Ringelmann or 5% opacity, the facility will conduct a EPA Method 5 test within 30 days of detection of visible emissions to demonstrate compliance with the particulate matter emission limit.. [District 2201 Rule and District Rule 1081] Federally Enforceable Through Title V Permit
20. Records of visible emissions inspections shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
21. By the end of each calendar month, the permittee shall record the following information for the previous calendar month: pounds of all blowing agent introduced into the process; pounds of polystyrene foam produced, pounds of thermoformer and extruder scrap entering reclaim operations, pounds of RPP produced, and total hours of operation. The average daily VOC emissions for the month shall be calculated using this data. Such records shall be made readily available for District inspection upon request. [District Rules 1070, 2201 and 4682] Federally Enforceable Through Title V Permit
22. Operator shall maintain records of mass balance calculations to verify compliance with daily VOC emission limit (calculated on a monthly average) and make such records readily available for District inspection upon request. [District Rules 1070, 2201 and 4682] Federally Enforceable Through Title V Permit
23. Operator shall maintain records of daily actual hours of operation and make such records readily available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
24. Average daily amount of material input to extruders shall be calculated as follows: $(\text{actual daily hours}) \times ((\text{total polystyrene foam processed in month})/(\text{total hours of operation in month}))$. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

25. Annual records of VOC content of thermoformed products, VOC content of RPP, and RTO control efficiency shall be made available for District inspection upon request for a period of 5 years. [District Rule 1070] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.



AUTHORITY TO CONSTRUCT

PERMIT NO: S-892-10-28

ISSUANCE DATE: 01/30/2012

LEGAL OWNER OR OPERATOR: PACTIV LLC
MAILING ADDRESS: 2024 NORRIS RD
BAKERSFIELD, CA 93308-2297

LOCATION: 2024 NORRIS RD
ATTN: ENVIRONMENTAL ENGINEER
BAKERSFIELD, CA 93308-2297

SECTION: NE10 **TOWNSHIP:** 29S **RANGE:** 27E

EQUIPMENT DESCRIPTION:

MODIFICATION OF POLYSTYRENE FOAM EXTRUSION PROCESS CONSISTING OF 10 FOAM EXTRUSION LINES:
CONVERT ONE FOAM EXTRUSION LINE TO AIR COOLED

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Operation shall be equipped with roll storage area. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Blowing agent shall consist of isopentane, 10% or greater CO₂ by weight, and methyl formate in amounts necessary to comply with District Rule 4682, Section 5.3.1 on a monthly basis. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
5. Methyl Formate usage shall not exceed 1,975 lb/day. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
6. Particulate matter (PM-10) emissions shall not exceed 0.008 lbm PM-10 per 1,000 lbm polystyrene foam processed. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-5500 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO

7. Total Materials Input (TMI) shall include the total material (including virgin and recycled polystyrene, nucleator, colorant and any other solid additives, and all the blowing agents) fed into the extruders or used in making the final product. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Total VOC emissions from polystyrene foam processing, forming, and on-site storage operations S-892-10 and S-892-17 shall not exceed 8.2 lb per ton of TMI. This emission limit is shared between S-892-10 and S-892-17. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
9. Facility TMI shall not exceed 151.2 tons per day (calculated on a monthly average). [District Rule 2201] Federally Enforceable Through Title V Permit
10. The lifetime emissions from total material input (TMI) shall not exceed 2.4 lb VOC/100 lb TMI (calculated on a monthly average). [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
11. Total VOC emissions from polystyrene foam processing, forming and on-site storage operations shall not exceed 1,233.8 lbs/day (calculated on a monthly average). [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
12. Total VOC blowing agent consumption for the entire facility shall not exceed 8,867.9 lb/day (calculated on a monthly average). [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
13. Weight of VOC blowing agent retained in finished product shall be determined using test method ASTM-D7132-05. [District Rules 1081 and 2201] Federally Enforceable Through Title V Permit
14. Permittee shall perform blowing agent retention testing on an annual basis. Such results will be used to calculate emissions for both the 8.2 lb per ton TMI and 2.4 lb/100 lb TMI emissions limits. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
15. VOC emissions from polystyrene foam processing, forming, and on-site storage operations, per ton of TMI shall be calculated on a monthly basis, using the following equation: $\text{lbs VOC emitted per ton of TMI} = (2000)[\text{BAI} - (\text{PFP} \times \text{BAR}) - \text{BAD} + \text{WH}]/\text{TMI}$ where BAI = pounds VOC blowing agent introduced/month, PFP = pounds of polystyrene foam produced/month, BAR = weight fraction of VOC blowing agent retained in finished product, BAD = pounds of VOC blowing agent destroyed/month in the RTO, WH = pounds of onsite warehouse emissions, and TMI = total materials input/month. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
16. Lifetime emissions of VOC (LE) from total material input (TMI) shall be calculated on a monthly basis using the following equation: $\text{LE (lb VOC/100 lb TMI)} = 100 \times [\text{BAI} - (\text{RECOLL} \times \text{EFF})]/\text{TMI}$ where BAI = pounds VOC blowing agent used/month, RECOLL = pounds blowing agent captured/month from reclaim operations, EFF = control efficiency of thermal oxidizer, and TMI is the total material (including virgin and recycled polystyrene, nucleator, colorant and any other solid additives, and all the blowing agents) processed/month. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
17. Quantity of VOCs from the extruders, captured from reclaim operations, RECOLL, shall be calculated on a monthly basis using the following equation: $\text{RECOLL} = (\text{SCRAPBA} - \text{RPPBA})$ where SCRAPBA = pounds of thermoformer and extruder scrap VOCs entering the reclaim operations per month from the extruders and RPPBA is the pounds/month RPP VOCs (VOCs in reclaimed polystyrene pellets) made from thermoformer and extruder scrap from the extruders. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
18. VOC content of thermoformed products and reclaimed polystyrene pellets (RPP) shall be determined on an annual basis. [District Rule 2201] Federally Enforceable Through Title V Permit
19. RTO control efficiency shall be determined on an annual basis. [District Rule 2201] Federally Enforceable Through Title V Permit
20. Based on 2002 source test, RTO capture efficiency for calculational purposes shall be 100%. RTO capture efficiency shall be recalculated within 60 days of any change in equipment or process design. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

21. The facility shall conduct weekly visual inspections to determine whether visible emissions are present. If visible emissions are present, the facility will conduct a USEPA Method 9 test within 48 hours. If the Method 9 test indicates that visible emissions are in excess of 1/4 Ringelmann or 5% opacity, the facility will conduct a EPA Method 5 test within 30 days of detection of visible emissions to demonstrate compliance with the particulate matter emission limit. [District NSR Rule and District Rule 1081] Federally Enforceable Through Title V Permit
22. Records of visible emissions inspections shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
23. By the end of each calendar month, the permittee shall record the following information for the previous calendar month: pounds of all blowing agent introduced into the process; pounds of polystyrene foam produced, pounds of thermoformer and extruder scrap entering reclaim operations, pounds of RPP produced, and total hours of operation. The average daily VOC emissions for the month shall be calculated using this data. Such records shall be made readily available for District inspection upon request. [District Rules 1070, 2201 and 4682] Federally Enforceable Through Title V Permit
24. Operator shall maintain records of mass balance calculations to verify compliance with daily VOC emission limit (calculated on a monthly average) and make such records readily available for District inspection upon request. [District Rules 1070, 2201 and 4682] Federally Enforceable Through Title V Permit
25. Operator shall maintain records of daily actual hours of operation and make such records readily available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
26. Operator shall maintain records of monthly calculations of lifetime emissions and shall make such records readily available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
27. Average daily amount of material input to extruders shall be calculated as follows: (actual daily hours) x ((total polystyrene foam processed in month)/(total hours of operation in month)). [District Rule 2201] Federally Enforceable Through Title V Permit
28. Annual records of VOC content of thermoformed products, VOC content of RPP, and RTO control efficiency shall be made available for District inspection upon request for a period of 5 years. [District Rule 1070] Federally Enforceable Through Title V Permit



AUTHORITY TO CONSTRUCT

PERMIT NO: S-892-10-29

ISSUANCE DATE: 01/30/2012

LEGAL OWNER OR OPERATOR: PACTIV LLC
MAILING ADDRESS: 2024 NORRIS RD
BAKERSFIELD, CA 93308-2297

LOCATION: 2024 NORRIS RD
ATTN: ENVIRONMENTAL ENGINEER
BAKERSFIELD, CA 93308-2297

SECTION: NE10 **TOWNSHIP:** 29S **RANGE:** 27E

EQUIPMENT DESCRIPTION:

MODIFICATION OF POLYSTYRENE FOAM EXTRUSION PROCESS CONSISTING OF 10 FOAM EXTRUSION LINES:
CONVERT ONE FOAM EXTRUSION LINE TO AIR COOLED

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Operation shall be equipped with roll storage area. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Blowing agent shall consist of isopentane, 10% or greater CO₂ by weight, and methyl formate in amounts necessary to comply with District Rule 4682, Section 5.3.1 on a monthly basis. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
5. Methyl Formate usage shall not exceed 1,975 lb/day. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
6. Particulate matter (PM-10) emissions shall not exceed 0.008 lbm PM-10 per 1,000 lbm polystyrene foam processed. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-5500 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO

7. Total Materials Input (TMI) shall include the total material (including virgin and recycled polystyrene, nucleator, colorant and any other solid additives, and all the blowing agents) fed into the extruders or used in making the final product. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Total VOC emissions from polystyrene foam processing, forming, and on-site storage operations S-892-10 and S-892-17 shall not exceed 8.2 lb per ton of TMI. This emission limit is shared between S-892-10 and S-892-17. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
9. Facility TMI shall not exceed 151.2 tons per day (calculated on a monthly average). [District Rule 2201] Federally Enforceable Through Title V Permit
10. The lifetime emissions from total material input (TMI) shall not exceed 2.4 lb VOC/100 lb TMI (calculated on a monthly average). [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
11. Total VOC emissions from polystyrene foam processing, forming and on-site storage operations shall not exceed 1,233.8 lbs/day (calculated on a monthly average). [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
12. Total VOC blowing agent consumption for the entire facility shall not exceed 8,867.9 lb/day (calculated on a monthly average). [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
13. Weight of VOC blowing agent retained in finished product shall be determined using test method ASTM-D7132-05. [District Rules 1081 and 2201] Federally Enforceable Through Title V Permit
14. Permittee shall perform blowing agent retention testing on an annual basis. Such results will be used to calculate emissions for both the 8.2 lb per ton TMI and 2.4 lb/100 lb TMI emissions limits. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
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20. Based on 2002 source test, RTO capture efficiency for calculational purposes shall be 100%. RTO capture efficiency shall be recalculated within 60 days of any change in equipment or process design. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

21. The facility shall conduct weekly visual inspections to determine whether visible emissions are present. If visible emissions are present, the facility will conduct a USEPA Method 9 test within 48 hours. If the Method 9 test indicates that visible emissions are in excess of 1/4 Ringelmann or 5% opacity, the facility will conduct a EPA Method 5 test within 30 days of detection of visible emissions to demonstrate compliance with the particulate matter emission limit. [District NSR Rule and District Rule 1081] Federally Enforceable Through Title V Permit
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24. Operator shall maintain records of mass balance calculations to verify compliance with daily VOC emission limit (calculated on a monthly average) and make such records readily available for District inspection upon request. [District Rules 1070, 2201 and 4682] Federally Enforceable Through Title V Permit
25. Operator shall maintain records of daily actual hours of operation and make such records readily available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
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28. Annual records of VOC content of thermoformed products, VOC content of RPP, and RTO control efficiency shall be made available for District inspection upon request for a period of 5 years. [District Rule 1070] Federally Enforceable Through Title V Permit



AUTHORITY TO CONSTRUCT

PERMIT NO: S-892-10-30

ISSUANCE DATE: 01/30/2012

LEGAL OWNER OR OPERATOR: PACTIV LLC
MAILING ADDRESS: 2024 NORRIS RD
BAKERSFIELD, CA 93308-2297

LOCATION: 2024 NORRIS RD
ATTN: ENVIRONMENTAL ENGINEER
BAKERSFIELD, CA 93308-2297

SECTION: NE10 **TOWNSHIP:** 29S **RANGE:** 27E

EQUIPMENT DESCRIPTION:

MODIFICATION OF POLYSTYRENE FOAM EXTRUSION PROCESS CONSISTING OF 10 FOAM EXTRUSION LINES:
CONVERT ONE FOAM EXTRUSION LINE TO AIR COOLED

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Operation shall be equipped with roll storage area. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Blowing agent shall consist of isopentane, 10% or greater CO₂ by weight, and methyl formate in amounts necessary to comply with District Rule 4682, Section 5.3.1 on a monthly basis. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
5. Methyl Formate usage shall not exceed 1,975 lb/day. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
6. Particulate matter (PM-10) emissions shall not exceed 0.008 lbm PM-10 per 1,000 lbm polystyrene foam processed. [District Rule 2201] Federally Enforceable Through Title V Permit

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8. Total VOC emissions from polystyrene foam processing, forming, and on-site storage operations S-892-10 and S-892-17 shall not exceed 8.2 lb per ton of TMI. This emission limit is shared between S-892-10 and S-892-17. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
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CONDITIONS CONTINUE ON NEXT PAGE

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28. Annual records of VOC content of thermoformed products, VOC content of RPP, and RTO control efficiency shall be made available for District inspection upon request for a period of 5 years. [District Rule 1070] Federally Enforceable Through Title V Permit

ATTACHMENT II

Emissions Profiles

Permit #: S-892-10-31	Last Updated
Facility: PACTIV LLC	02/25/2012 EDGEHILR

Equipment Pre-Baselined: NO

	<u>NOX</u>	<u>SOX</u>	<u>PM10</u>	<u>CO</u>	<u>VOC</u>
Potential to Emit (lb/Yr):	0.0	0.0	0.0	0.0	450334.0
Daily Emis. Limit (lb/Day)	0.0	0.0	0.0	0.0	1233.8
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	0.0
Q2:	0.0	0.0	0.0	0.0	0.0
Q3:	0.0	0.0	0.0	0.0	0.0
Q4:	0.0	0.0	0.0	0.0	0.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Permit #: S-892-10-32	Last Updated
Facility: PACTIV LLC	02/25/2012 EDGEHILR

Equipment Pre-Baselined: NO

	<u>NOX</u>	<u>SOX</u>	<u>PM10</u>	<u>CO</u>	<u>VOC</u>
Potential to Emit (lb/Yr):	0.0	0.0	0.0	0.0	450334.0
Daily Emis. Limit (lb/Day)	0.0	0.0	0.0	0.0	1233.8
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	0.0
Q2:	0.0	0.0	0.0	0.0	0.0
Q3:	0.0	0.0	0.0	0.0	0.0
Q4:	0.0	0.0	0.0	0.0	0.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Permit #: S-892-10-33	Last Updated
Facility: PACTIV LLC	02/25/2012 EDGEHILR

Equipment Pre-Baselined: NO

	<u>NOX</u>	<u>SOX</u>	<u>PM10</u>	<u>CO</u>	<u>VOC</u>
Potential to Emit (lb/Yr):	0.0	0.0	0.0	0.0	450334.0
Daily Emis. Limit (lb/Day)	0.0	0.0	0.0	0.0	1233.8
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	0.0
Q2:	0.0	0.0	0.0	0.0	0.0
Q3:	0.0	0.0	0.0	0.0	0.0
Q4:	0.0	0.0	0.0	0.0	0.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

ATTACHMENT III
Title V Compliance Certification Form

RECEIVED

FEB 17 2012

SJVAPCD
Southern Region

San Joaquin Valley
Unified Air Pollution Control District

TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)

☐ SIGNIFICANT PERMIT MODIFICATION
☒ MINOR PERMIT MODIFICATION

☐ ADMINISTRATIVE
AMENDMENT

COMPANY NAME: Pactiv Corporation	FACILITY ID: S - 892
1. Type of Organization: <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input type="checkbox"/> Government <input type="checkbox"/> Partnership <input type="checkbox"/> Utility	
2. Owner's Name: Pactiv LLC	
3. Agent to the Owner:	

II. COMPLIANCE CERTIFICATION (Read each statement carefully and initial **all** circles for confirmation):

- ☒ Based on information and belief formed after reasonable inquiry, the equipment identified in this application will continue to comply with the applicable federal requirement(s).
- ☒ Based on information and belief formed after reasonable inquiry, the equipment identified in this application will comply with applicable federal requirement(s) that will become effective during the permit term, on a timely basis.
- ☒ Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.
- ☒ Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true accurate and complete.

I declare, under penalty of perjury under the laws of the state of California, that the forgoing is correct and true:

February 17, 2012

Signature of Responsible Official

Date

Mike Perez

Name of Responsible Official (please print)

Plant Manager

Title of Responsible Official (please print)

ATTACHMENT IV

Draft Authorities to Construct (ATCs)

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT

PERMIT NO: S-892-10-31

LEGAL OWNER OR OPERATOR: PACTIV LLC
MAILING ADDRESS: 2024 NORRIS RD
BAKERSFIELD, CA 93308-2297

LOCATION: 2024 NORRIS RD
ATTN: ENVIRONMENTAL ENGINEER
BAKERSFIELD, CA 93308-2297

SECTION: NE10 TOWNSHIP: 29S RANGE: 27E

EQUIPMENT DESCRIPTION:

MODIFICATION OF POLYSTYRENE FOAM EXTRUSION PROCESS CONSISTING OF 10 FOAM EXTRUSION LINES:
CONVERT ONE FOAM EXTRUSION LINE TO AIR COOLED

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Operation shall be equipped with roll storage area. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Blowing agent shall consist of isopentane, 10% or greater CO₂ by weight, and methyl formate in amounts necessary to comply with District Rule 4682, Section 5.3.1 on a monthly basis. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
5. Methyl Formate usage shall not exceed 1,975 lb/day. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
6. Particulate matter (PM-10) emissions shall not exceed 0.008 lbm PM-10 per 1,000 lbm polystyrene foam processed. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

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Sayed Sadredin, Executive Director APCO

DAVID WARNER, Director of Permit Services

S-892-10-31 : Feb 27 2012 2:23PM -- EDGEHILL : Joint Inspection NOT Required

7. Total Materials Input (TMI) shall include the total material (including virgin and recycled polystyrene, nucleator, colorant and any other solid additives, and all the blowing agents) fed into the extruders or used in making the final product. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Total VOC emissions from polystyrene foam processing, forming, and on-site storage operations S-892-10 and S-892-17 shall not exceed 8.2 lb per ton of TMI. This emission limit is shared between S-892-10 and S-892-17. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
9. Facility TMI shall not exceed 151.2 tons per day (calculated on a monthly average). [District Rule 2201] Federally Enforceable Through Title V Permit
10. The lifetime emissions from total material input (TMI) shall not exceed 2.4 lb VOC/100 lb TMI (calculated on a monthly average). [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
11. Total VOC emissions from polystyrene foam processing, forming and on-site storage operations shall not exceed 1,233.8 lbs/day (calculated on a monthly average). [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
12. Total VOC blowing agent consumption for the entire facility shall not exceed 8,867.9 lb/day (calculated on a monthly average). [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
13. Weight of VOC blowing agent retained in finished product shall be determined using test method ASTM-D7132-05. [District Rules 1081 and 2201] Federally Enforceable Through Title V Permit
14. Permittee shall perform blowing agent retention testing on an annual basis. Such results will be used to calculate emissions for both the 8.2 lb per ton TMI and 2.4 lb/100 lb TMI emissions limits. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
15. VOC emissions from polystyrene foam processing, forming, and on-site storage operations, per ton of TMI shall be calculated on a monthly basis, using the following equation: $\text{lbs VOC emitted per ton of TMI} = (2000)[\text{BAI} - (\text{PFP} \times \text{BAR}) - \text{BAD} + \text{WH}]/\text{TMI}$ where BAI = pounds VOC blowing agent introduced/month, PFP = pounds of polystyrene foam produced/month, BAR = weight fraction of VOC blowing agent retained in finished product, BAD = pounds of VOC blowing agent destroyed/month in the RTO, WH = pounds of onsite warehouse emissions, and TMI = total materials input/month. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
16. Lifetime emissions of VOC (LE) from total material input (TMI) shall be calculated on a monthly basis using the following equation: $\text{LE (lb VOC/100 lb TMI)} = 100 \times [\text{BAI} - (\text{RECOLL} \times \text{EFF})]/\text{TMI}$ where BAI = pounds VOC blowing agent used/month, RECOLL = pounds blowing agent captured/month from reclaim operations, EFF = control efficiency of thermal oxidizer, and TMI is the total material (including virgin and recycled polystyrene, nucleator, colorant and any other solid additives, and all the blowing agents) processed/month. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
17. Quantity of VOCs from the extruders, captured from reclaim operations, RECOLL, shall be calculated on a monthly basis using the following equation: $\text{RECOLL} = (\text{SCRAPBA} - \text{RPPBA})$ where SCRAPBA = pounds of thermoformer and extruder scrap VOCs entering the reclaim operations per month from the extruders and RPPBA is the pounds/month RPP VOCs (VOCs in reclaimed polystyrene pellets) made from thermoformer and extruder scrap from the extruders. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
18. VOC content of thermoformed products and reclaimed polystyrene pellets (RPP) shall be determined on an annual basis. [District Rule 2201] Federally Enforceable Through Title V Permit
19. RTO control efficiency shall be determined on an annual basis. [District Rule 2201] Federally Enforceable Through Title V Permit
20. Based on 2002 source test, RTO capture efficiency for calculational purposes shall be 100%. RTO capture efficiency shall be recalculated within 60 days of any change in equipment or process design. [District Rule 2201] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

21. The facility shall conduct weekly visual inspections to determine whether visible emissions are present. If visible emissions are present, the facility will conduct a USEPA Method 9 test within 48 hours. If the Method 9 test indicates that visible emissions are in excess of 1/4 Ringelmann or 5% opacity, the facility will conduct a EPA Method 5 test within 30 days of detection of visible emissions to demonstrate compliance with the particulate matter emission limit. [District NSR Rule and District Rule 1081] Federally Enforceable Through Title V Permit
22. Records of visible emissions inspections shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
23. By the end of each calendar month, the permittee shall record the following information for the previous calendar month: pounds of all blowing agent introduced into the process; pounds of polystyrene foam produced, pounds of thermoformer and extruder scrap entering reclaim operations, pounds of RPP produced, and total hours of operation. The average daily VOC emissions for the month shall be calculated using this data. Such records shall be made readily available for District inspection upon request. [District Rules 1070, 2201 and 4682] Federally Enforceable Through Title V Permit
24. Operator shall maintain records of mass balance calculations to verify compliance with daily VOC emission limit (calculated on a monthly average) and make such records readily available for District inspection upon request. [District Rules 1070, 2201 and 4682] Federally Enforceable Through Title V Permit
25. Operator shall maintain records of daily actual hours of operation and make such records readily available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
26. Operator shall maintain records of monthly calculations of lifetime emissions and shall make such records readily available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
27. Average daily amount of material input to extruders shall be calculated as follows: (actual daily hours) x ((total polystyrene foam processed in month)/(total hours of operation in month)). [District Rule 2201] Federally Enforceable Through Title V Permit
28. Annual records of VOC content of thermoformed products, VOC content of RPP, and RTO control efficiency shall be made available for District inspection upon request for a period of 5 years. [District Rule 1070] Federally Enforceable Through Title V Permit

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT

PERMIT NO: S-892-10-32

LEGAL OWNER OR OPERATOR: PACTIV LLC
MAILING ADDRESS: 2024 NORRIS RD
BAKERSFIELD, CA 93308-2297

LOCATION: 2024 NORRIS RD
ATTN: ENVIRONMENTAL ENGINEER
BAKERSFIELD, CA 93308-2297

SECTION: NE10 **TOWNSHIP:** 29S **RANGE:** 27E

EQUIPMENT DESCRIPTION:

MODIFICATION OF POLYSTYRENE FOAM EXTRUSION PROCESS CONSISTING OF 10 FOAM EXTRUSION LINES:
CONVERT ONE FOAM EXTRUSION LINE TO AIR COOLED

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
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3. Operation shall be equipped with roll storage area. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Blowing agent shall consist of isopentane, 10% or greater CO₂ by weight, and methyl formate in amounts necessary to comply with District Rule 4682, Section 5.3.1 on a monthly basis. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
5. Methyl Formate usage shall not exceed 1,975 lb/day. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
6. Particulate matter (PM-10) emissions shall not exceed 0.008 lbm PM-10 per 1,000 lbm polystyrene foam processed. [District Rule 2201] Federally Enforceable Through Title V Permit

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Seyed Sadredin, Executive Director / APCO

DAVID WARNER, Director of Permit Services

S-892-10-32 : Feb 27 2012 2:23PM - EDGEHILL : Joint Inspection NOT Required

7. Total Materials Input (TMI) shall include the total material (including virgin and recycled polystyrene, nucleator, colorant and any other solid additives, and all the blowing agents) fed into the extruders or used in making the final product. [District Rule 2201] Federally Enforceable Through Title V Permit
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9. Facility TMI shall not exceed 151.2 tons per day (calculated on a monthly average). [District Rule 2201] Federally Enforceable Through Title V Permit
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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT

PERMIT NO: S-892-10-33

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